

Prepared by <u>Bob Heil</u> On Friday, August 19, 2005



# Volatile Organic Compounds from Processes and Consumer Products Workgroup Meeting Held August 9, 2005

Somerset County Office of Emergency Management Training Building, Hillsborough Township, Somerset County

Meeting called by: Bob Heil, Group Leader Co-Facilitators: Tonalee Key, Nicholle Jackson

## Attendees:

Name	Affiliation
Hiram Oser <sup>1</sup>	NJDEP – Air Enforcement Program
Eileen Moyer <sup>1</sup>	Reckitt Benckiser
Heidi McAullife <sup>1</sup>	NPCA (via speakerphone)
Rob Mahler <sup>1</sup>	Church & Dwight
Rosemary Zaleski	ExxonMobil Biomedical Sciences
Ed Biedell	Terranext
Richard Moore	Alton Envt. Services
Tim Roessler	IMTT – Bayonne
Josh Worth	Wawa, Inc
Pat Brown	Chevron
Mike Adhanom,	NJDEP – Air Permitting
Michelle Donohue	Graphic Arts Association
Tony Russo	Chemistry Council New Jersey
Michael	Clough Harbour Assoc.
Tsakaloyannis <sup>2</sup>	
Gwen Schell <sup>2</sup>	Griffin Pipe Products
Dena Mottola <sup>2</sup>	NJ PIRG
Victor Ciarlante <sup>2</sup>	Thermatrix
Bob Smyth <sup>2</sup>	TES Technologies
Bob Smith <sup>2</sup>	Synergy Environmental
Max Friedman <sup>2</sup>	NJDEP – Air Permitting
Doug Lafayette <sup>2</sup>	Conoco Phillips
Toby Hanna <sup>2</sup>	ERM

- 1- Indicates attendance at morning session only
- 2 Indicates attendance at afternoon session only

Materials: Agenda, Minutes from July 12, 2005 VOC workgroup meeting

Call to Order [15 Minutes]
Attendees Sign In
Review of minutes from the 7/12/05 Workgroup Meeting

#### Discussion

### **Topic 1: Defining Workgroup Goals and Report Format**

#### Discussion:

- Tonalee Key (NJDEP) discussed the overall goal of the workgroup and the use of the ideas generated by the group to be used towards SIP, modeling and VOC attainment in general
- Tonalee Key also presented some very preliminary draft numbers based on CAIR model that quantifies necessary emission reductions. Essentially, NJDEP needs to demonstrate as much VOC emission as possible with a very draft reduction goal of 600 Tons per Day of VOC+NOx (combined).
- Discussion also centered on the group's final report to NJDEP Management, the content and disclaimers of such a report and the uses of that report by NJDEP Air Quality Management.
- Final discussion on this topic was on timeframes of drafting a report and the presentation to Management. Workgroup leader Bob Heil emphasized the need to be on or ahead of schedule.
- Workgroup members suggested that proposals be quantified to the best extent possible in the final report

**Conclusion:** Workgroup members were given a clarification of the workgroup goals and are encouraged to begin formulating draft report ideas.

## Action Items/Person(s) responsible/Deadline:

1. All workgroup members – Begin to draft report ideas and have items ready for discussion at next meeting.

## **Topic 2: Consumer Products/Architectural Coatings**

#### Discussion:

- Eileen Moyer, Reckitt Benckiser, presented an overview of Consumer Products status, especially in regards to California standards and federal standards. Comparison of the OTC model vs. "Cons1" vs. proposed "Cons2" and the proposed reductions of these measures.
- Heidi McAuliffe, National Paint and Coating Council, participated via conference call and echoed and expanded upon the comments of Ms. Mover
- Issues concerning Reactivity were also discussed as well as HAPs in Consumer Products and the use of hydrocarbon versus CO2 propellants
- Specific VOC Tracking Items were discussed (VOC-002 Reactivity Guidelines, VOC-003 Consumer Products, VOC-004 Portable Fuel Containers, and VOC-014 Green product purchases)

**Conclusions:** The workgroup has reached conclusions on each of the above tracking items. Specifically, nearly unanimous agreement on Reactivity Guidelines, Consumer Products, mandatory switch over to new Portable Fuel Containers and nearly unanimous disapproval of requiring "green products" in state contracts.

## Action Items/Person(s) responsible/Deadline:

- 1. NJDEP to review the CA SIP reductions from CONS1, CONS2, and aerosol reactivity regulations.
- 2. NJDEP to attempt to quantify emissions reductions from changeover of Portable Fuel Containers

#### Lunch break 1200 - 1300 Hours

Revisitation of Topic 1 from the Morning for those attendees who chose to attend afternoon only session

## Topic 3: Area sources by NJAC 7:27-16

#### Discussion:

- Discussion led by Tim Roessler, IMTT, on Marine Ballasting. He suggested that this number on the inventory is somewhat flawed in that marine ballasting occurs off shore at the "anchorage" and not necessarily in port, and that most ships are double hulled. Additionally, barges don't ballast.
- Discussion led by Michelle Donohue, Graphic Arts Association. Ms. Donohue disputed the emission factor
  for graphic arts inventory calculation by asserting the emission factor of 1.3 is in error and an emission
  factor of 0.8 or even 0.5 should be used instead. Additionally, Ms. Donohue pointed out that there is a
  SOTA established for graphic arts and further emission reductions on graphic arts would target primarily
  small businesses.
- Discussion led by Josh Worth, Wawa, with short presentation of technology on membrane technology to minimize breathing losses at retail gasoline dispensing stations. Discussion of applicability with ORVR and vacuum assisted vs. balanced air systems.
- Discussion of VOC Tracking Proposals:
- VOC-001 Tabled extensive discussion until next meeting
- VOC-005 New membrane technology to control VOCs from gasoline retail tanks.
- VOV-006 Improve Gasoline dispensing Various educational issues such as topping off, increased enforcement, etc.
- VOC-007 Marine Ballasting, preliminarily determined to be a non-issue
- VOV-009 Increase capture efficiency at Graphic Arts operations discussion to be continued at next meeting
- VOC-010 Lower exclusion rate for subchapter 16.7 generally opposed by industry, continue discussion at next meeting.

#### Action Items/Person(s) responsible/Deadline:

- 1. NJDEP Air Permitting will attempt to identify how many graphic arts sources are not subject to the current SOTA standard for graphic arts sources.
- 2. NJDEP and Josh Worth to investigate the emissions from mandatory "Weights and Measures" calibrations

## Topic 4: Industrial Point Sources covered under NJAC 7:27-16

#### **Discussion:**

- Discussion was initiated by NJDEP Permitting staff on the issue of emission reductions of bulk VOC (primarily gasoline) storage tanks and refinery flaring operations.
- Discussion of bulk tanks. NJDEP believes that emissions can be further reduced. Industry reps feel
  that internal floating roofs are the SOTA and emissions of all tanks may be overstated due to out of
  date USEPA emission factors. VOC Tracking Item VOC-008 to be continued at next meeting.
- Discussion of Refinery Flares led by NJDEP Permit staff indicates that refinery flaring is a large point source of the emissions inventory and that reductions can be made that are economically viable. Also consideration that the flare issue should possibly include chemical plants with flares.
  - VOC Tracking item VOC-011 to be continued at next meeting.
  - Discussion of VOC from landfill gas. Bob Heil of Air Enforcement stated that his information was incomplete but area sources are a collection of very small or defunct sites that cumulatively account for 547 TPY VOC. Title V sources need to be looked at prior to next meeting, where VOC Tracking # VOC-012 to be continued.

#### **New Business**

## Leak Detection and Repair (LDAR)

- A workgroup member suggested a further look at LDAR to include operations not currently covered by LDAR. The workgroup member also referenced a Texas study in which flyovers of petroleum and chemical sites using infrared technology identified sources and open hatched barges.
- This item to be given a VOC Tracking number for extensive discussion at next meeting.

## Tank Cleaning –

- NJDEP Air Permitting staff suggested that "Tank Cleaning" at large bulk facilities be investigated to determine emissions and potential future reductions of emissions from this process.
- This item to be given a specific VOC Tracking number for extensive discussion at next meeting.

## Wastewater Treatment Plants –

One workgroup member questioned the emissions from Wastewater treatment plants. At the last
meeting, representatives of WWTP stated that the new MACT standards were sufficient, however
this needs to be reviewed and quantified at the next meeting and thus will be given a VOC Tracking
number.

## Action Items/Person(s) responsible/Deadline:

- 1. NJDEP and Tim Roessler to investigate subchapter 16 position on storage tanks, slotted guidepoles and tank cleaning operations.
- 2. NJDEP Air Permitting staff to attempt to quantify and provide scope of affected petrochemical and chemical plants affected by flaring issues.
- 3. NJDEP to provide further information on Point Source emissions from Landfill operations.
- 4. Workgroup members encourage to provide their experience on LDAR and the potential inclusion of operations not currently covered.
- 5. Workgroup members are encouraged to bring their experience of Wastewater Treatment Plants in regards to VOC and emission control. NJDEP to attempt to identify sources not subject to new standards.

## Wrap-up [10 minutes]

- Logistics for the next meeting were discussed, including an offer by Chemistry Council of New Jersey to utilize their conference room. Location to be determined by NJDEP staff
- A feedback survey was distributed to the workgroup. The results of the survey will determine whether or not an emissions inventory subgroup is formed and the effectiveness of the webpage in disseminating information.

•	Assignments for next meeting will be sent via e-mail to applicable members